

AO 91 (Rev. 11/11) Criminal Complaint

~~JUL 15 2016~~

UNITED STATES DISTRICT COURT

for the

District of New Mexico

MATTHEW J. DYKMAN

CLERK

United States of America

v.

Joleen Sadillo, YOB 1975, SSAN 3956;  
Abel Lopez, YOB 1985; SSAN 8365; and  
William Colbert, YOB 1978, SSAN 4151;

Defendant(s)

Case No.

16 mj 2915

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 07/14/2016 in the county of Bernalillo in the  
District of New Mexico, the defendant(s) violated:

Code Section

Offense Description

18:2113  
18:2

Bank Robbery  
Aiding and Abetting

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.




Complainant's signature

Peter Jon Nystom Ubbelohde

Printed name and title

Sworn to before me and signed in my presence.

Date: 07/15/2016



Judge's signature

City and state: Albuquerque, New Mexico

Steven C. Yarbrough, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT OF PETER JON N. UBBELOHDE**

Your Affiant, Peter Jon Nystrom Ubbelohde, having been first duly sworn, does hereby depose and state as follows:

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice. I have been so employed since June 2015. I am therefore authorized to investigate federal criminal offenses. I am currently a member of the Violent Crimes Squad of the Albuquerque Division of the FBI and as such have participated in investigations of suspected violations of federal bank robbery laws, including Title 18, United States Code (USC), Section (§) 2113 and Section (§) 2. The information set forth in this affidavit has been derived from my own investigation or communicated to me by other sworn law enforcement officers or from reliable sources.
2. This affidavit will show there is probable cause in support of a criminal against Joleen Sedillo (year of birth 1975, SSN xxx-xx-3956, Abel Lopez (year of birth 1985, SSN xxx-xx-8365 and William Colbert (year of birth 1978, SSN xxx-xx-4151), for a violation of 18 USC § 2113, that being bank robbery, and 18 USC § 2, that being adding and abetting.
3. The statements contained in this affidavit are based upon your Affiant's investigation, training and experience and information provided by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your Affiant has not included each and every fact known to your Affiant concerning this investigation. Your Affiant has set forth only the facts which your Affiant believes are necessary to establish probable cause to support a criminal complaint and arrest warrant against Joleen Sedillo, Abel Lopez and William Colbert, in violation of 18 USC § 2113 and 18 USC § 2.

4. This investigation concerns an alleged violation of 18 USC § 2113 and 18 USC § 2.
5. 18 USC § 2113 prohibits taking, by force and violence or by intimidation, money in the possession of a bank or credit union.
6. 18 USC § 2 prohibits aiding, abetting, counseling, commanding, inducing or procuring the commission of an offense against the United States.
7. On June 22, 2016, at approximately 3:20 p.m., an unknown male subject entered the branch of Bank of the West located at 5401 Central Avenue (Ave) NE, Albuquerque, NM. The subject wore a hooded jacket with the hood worn over his head, a baseball cap, a bandana which covered the lower half of his face, gloves and light-colored sneakers. The subject approached the teller counter with both hands in the pockets of his jacket and made verbal robbery demands. Two victim tellers complied with the subject's robbery demands, taking US currency from their teller drawers and placing it on the counter. The subject collected the currency from the counter and exited the branch, carrying the currency in his hands. The subject fled on foot to a nearby gold-colored, older model sedan and got into the vehicle. The sedan had damage to its front end and its hood was not completely latched. A witness described the vehicle as a Hyundai Elantra. A driver, possibly female, was seated in the driver's seat, while a third individual was seated in the rear passenger compartment. The vehicle then departed. This bank robbery will hereinafter be referred to as Robbery 1.
8. On June 27, 2016, at approximately 3:37 p.m., a male subject entered the branch of Bank of the West located at 7900 Wyoming Blvd NE, Albuquerque, NM. The subject wore a hooded sweatshirt with the hood worn over his head, a bandana which covered the lower half of his face, dark-colored pants and light-colored sneakers. Witnesses described the subject as 5'9" or 6' tall and of slender build. The subject approached the teller counter

and made verbal robbery demands. The subject had both hands in the pockets of his sweatshirt as he approached the counter. The victim teller complied with the subject's robbery demands, handing over US currency to him. The subject collected the currency, carrying it in his hands and arms, and exited the branch. The subject ran to a gold-colored Hyundai and got into the vehicle. A bank employee observed that the vehicle was driven by a second individual, who had dark-colored hair. The vehicle exited the parking lot and headed northbound on Wyoming Blvd NE. An anonymous tipster subsequently contacted Crime Stoppers and stated that he had observed a tall, slender male wearing a red sweatshirt get into a tan car driven by a short, heavyset Hispanic female at 7900 Wyoming Blvd NE at or about the time of the robbery, and that the vehicle had driven westbound on Paseo del Norte NE. This bank robbery will be referred to hereinafter as Robbery 2

9. On or about June 28, 2016, an investigator employed by Bank of the West advised the FBI that due to the large recent volume of bank robberies, Bank of the West planned to employ security guards at all its branches in the Albuquerque area. No security guards were present during Robberies 1 or 2.
10. On July 1, 2016, a male individual wearing a hooded sweatshirt with the hood worn over his head and having a brown goatee entered the branch of Bank of the West located at 5901 Menaul Blvd NE, Albuquerque, NM. The subject appeared to notice that a security guard was present at the branch and exited the branch. A short time later, a male individual matching the same description entered the branch of Bank of the West located at 5401 Central Ave NE. The subject once again appeared to notice that a security guard was present at the branch and exited the branch. The security guard followed the subject outside and observed that the subject got into a gold-colored Hyundai Elantra bearing NM registration NFT393. A query of NM Motor Vehicle Division records reflected that

NFT393 is the registration of a gold-colored 2003 Hyundai four-door automobile, Vehicle Identification Number (VIN) KMHDN45D43U582375. An online query of the aforementioned VIN reflected that it belongs to a gold-colored 2003 Hyundai Elantra. The registered owner of the vehicle is Jolene Sedillo, whose driver's license information describes her as 5' tall and weighing 165 pounds. She has brown hair in her driver's license image.

11. On July 14, 2016, at approximately 12:10 p.m., a white male subject entered the branch of Bank of the West located at 5228 Central Ave SW, Albuquerque, NM. The subject was described as a white male approximately 5'11" or 6' tall and of slender build. Based on witnesses' descriptions and surveillance camera images, the subject wore a dark-colored, zippered, hooded sweatshirt with the hood worn on his head; a dark-colored beanie; a blue bandana; light-colored gloves; dark-colored pants; and white sneakers. The subject did not appear to carry a bag. The subject had one of his hands inside a pocket of the sweatshirt. The subject approached the teller counter and spoke to a bank employee. Due to the subject's low tone of voice, the teller did not understand some of what the subject stated, but did understand the phrases "money" and "in your register." The teller was aware through information provided to employees by Bank of the West security personnel that a subject or subjects had committed five robberies at Bank of the West branches in Albuquerque since May 20, 2016, and that the subject or subjects of those robberies had worn hooded sweatshirts or jackets with the hoods worn over their heads, bandanas which covered the lower halves of their faces, had held one hand in a pocket while approaching the teller counter, and had not carried a bag. Based on the subject's appearance and mannerism, the similarity of his appearance and mannerism to those of the other recent subject or subjects of robberies at Bank of the West branches in Albuquerque, and the fact that the subject had mentioned money and her register, the teller understood that the subject was robbing the branch. This bank robbery will be referred to hereinafter as

Robbery 3.

12. At that point one of the managers of the branch went and stood beside the teller and looked directly at the subject. The subject appeared to become nervous and exited the branch without receiving any money. The subject crossed 53rd St SW on foot to a parking lot. A bank employee observed him from inside the branch as he did so. The subject approached a gold-colored sedan which had no front bumper. The employee observed a second subject's hand on the steering wheel of the car. The first subject entered the vehicle from the passenger side. The vehicle immediately began to drive, proceeding northbound on 53rd St SW and then eastbound on Central Ave SW.
13. Special Agents of the FBI had recently obtained a warrant to install a tracking device on a 2003 Hyundai Elantra, New Mexico license plate number NFT393, VIN KMHDN45D43U582375 and had installed the device on the vehicle on July 13, 2016. The vehicle matched the description of the vehicle in which the aforementioned subject had fled. An agent reviewed tracking data transmitted by the device and determined that the device had been in the vicinity of 5228 Central Ave SW at the time of the robbery.
14. Detectives of the Albuquerque Police Department proceeded to 178-1/2 Atrisco Dr SW, Albuquerque, NM, located the aforementioned Hyundai parked on the driveway and began to conduct surveillance. A detective observed Jolene Sedillo walking back and forth from the Hyundai to an area of the yard in the southeastern portion of the property. Sedillo appeared to carry items from the car to that area of the yard. Sedillo entered the residence and exited it. She then approached a second vehicle, entered it, and departed the residence, driving a short distance northbound on Atrisco Dr SW. She then turned onto 4th St SW, proceeded a short distance northbound, and parked on the street behind a Blake's Lotaburger restaurant located at 114 Atrisco Dr SW.

15. Special Agents of the FBI interviewed residents of 178 Atrisco Dr SW. The residents stated that the building was divided into two separate residences, 178 and 178-1/2 Atrisco Dr SW, and that the members of both residences were all related to each other and to Sedillo, but that Sedillo did not live at either residence. They added that all members of both residences had full access to the yard and to a shed located in the southeastern corner of the yard. The shed is located near the area where the detective had observed Sedillo walking and carrying items from the Hyundai. Residents of both 178 and 178-1/2 Atrisco Dr SW gave their verbal and written consent to search their respective residences, as well as the yard and the aforementioned shed. FBI Agents searched the shed and located a dark-colored, hooded, zippered sweatshirt; a dark-colored beanie, light-colored gloves, and a blue bandana. All the items were located in one heap and were consistent in appearance with the items worn by the subject earlier the same day at the Bank of the West branch located at 5228 Central Ave SW.
16. One resident was further interviewed and stated that he had seen a male individual named William on the morning of the same day and that William had been wearing white sneakers. The family member identified William as an associate of Sedillo and Lopez. He added that earlier that afternoon, Sedillo had arrived in the Hyundai and that he had seen her in the southeastern area of the yard, near the shed.
17. On July 14, 2016 William Colbert, after being advised of his rights, freely and voluntarily told agents he had participated in Robberies 1, 2 and 3 with Sedillo and Lopez. He was the subject who entered the banks during all three robberies. Colbert said the morning of Robbery 3, Lopez entered the Bank of the West at 5228 Central Ave SW to case it. Lopez then called Colbert and Sedillo, who were waiting in Sedillo's car, to tell them to go



ahead with the robbery. Colbert was wearing his blue jeans, white shoes, and a black hooded sweatshirt. He took a moment to put on a bandana mask and went into the bank. He stated to the teller, "You know what this is?" Then he quickly walked off as he said he had a change of heart. He ran back to Sedillo's car and left the area. Sedillo dropped him off at the Burlington Coat Factory parking lot near 4208 Central Ave SW, where Colbert met Lopez. They then went to the Lotaburger restaurant located at 114 Atrisco Dr SW.

18. On July 14, 2016 Abel Lopez, after being advised of his rights, freely and voluntarily told agents he participated in bank robberies 1, 2 and 3 with Sedillo and Colbert. During robberies 1 and 2, Lopez waited in the car with Sedillo while Colbert went into the banks to commit robbery. Lopez said on the morning of robbery 3, he walked to the Bank of the West at 5228 Central Ave SW and entered the bank to case it. He left the bank and called Colbert, who was in Sedillo's car with her, to tell him to proceed with the robbery. Lopez met Colbert in the vicinity of the Burlington Coat Factory parking lot near 4208 Central Ave SW after which they went to the Lotaburger restaurant located at 114 Atrisco Dr SW.
19. On July 14, 2016 Joleen Sedillo, after being advised of her rights, freely and voluntarily told agents she participated in bank robberies 1, 2 and 3 with Lopez and Colbert. During Robberies 1 and 2, she drove her 2003 Hyundai Elantra with Colbert and Lopez. Lopez and Colbert advised her where to park, and she waited in the car with Lopez while Colbert went in to the bank to commit robbery. On the morning of Robbery 3, Lopez walked to the Bank of the West at 5228 Central Ave SW and entered the bank to case it while she drove Colbert and parked across the street from the bank. Lopez left the bank and called Colbert to proceed with the robbery. Colbert left her car and went into the bank. Shortly thereafter he ran out of the bank to her car and got in. She drove away and he told her that he didn't get any money because the teller pressed the alarm. Sedillo drove Colbert to the shopping center near the Burlington Coat Factory and Colbert got out

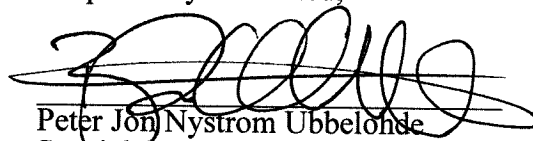


meeting with Lopez. She drove to 178 Atrisco Dr. SW and hid the clothes Colbert wore during the robbery. She then switched vehicles and took her aunts car and left the residence.

20. Bank of the West's deposits are insured by the Federal Deposit Insurance Corporation and it is therefore a bank as defined under 18 USC § 2113. Bank of the West suffered a financial loss in the robbery.
21. The aforementioned branches of Bank of the West are located in Bernalillo County, NM.
22. Based on the aforementioned facts, there is probable cause to believe that Joleen Sedillo, Abel Lopez, and William Colbert robbed the aforementioned branch of Bank of the West, in violation of 18 USC § 2113 and 18 USC § 2.


I swear that this information is true and correct to the best of my knowledge, information and belief.

Respectfully submitted,



Peter Jon Nystrom Ubbelohde  
Special Agent  
Federal Bureau of Investigation

Subscribed to and sworn to  
before me, this 15th day of July, 2016



STEVEN C. YARBROUGH  
United States Magistrate Judge  
Albuquerque, New Mexico